

**SANTA MONICA MOUNTAINS CONSERVANCY**

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Impact Analysis Section  
Los Angeles County, Department of Regional Planning  
320 West Temple Street, Room 1348  
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**Notice of Preparation Comments  
Northlake Specific Plan - Phase One Implementation  
Vesting Tentative Tract Map No. 51852**

Dear Dr. Chen:

The subject property in the Santa Clara River watershed contains regionally significant viewshed from Interstate 5 and regionally significant inter-mountain range habitat linkage potential between the Angeles and Los Padres National Forests. The ecological integration of these two national forests has a direct affect on the longterm ecological viability of all the habitat located in the Santa Monica Mountains Conservancy's jurisdiction. The project's adverse impacts to the Santa Clara River watershed will also have a direct effect on the ecological vitality of numerous sections of the Santa Clara River within the Rim of the Valley Trail Corridor.

**Post 1992 Cumulative Impact Escalation**

The Interstate 5-Castaic corridor has been subjected to extensive mass grading development since the 1992 approval of the Environmental Impact Report that covered the subject Specific Plan. To adequately address development impacts in the Castaic Creek watershed, the DEIR must include a comprehensive, revised cumulative impact analysis.

**Cross 15 - Inter-mountain Range Habitat Linkage Onsite**

The focus on inter-mountain range habitat linkages across Interstate 5 (I5) has sharpened greatly since 1992. The Draft Environmental Impact Report (DEIR) must address the regional ecological value of this cross-freeway wildlife habitat connection. The South Coast Wildlands project identifies this linkage in its landmark "*Missing Linkages*" report as the Western and Eastern Sierra Madre Mountains Linkage. Their specific follow-up report covering this linkage across Interstate 5 has not been completed.

In any case, the ecological interface between the Los Padres and Angeles National Forest ecosystems is of statewide importance. The quality and quantity of connectivity across I5 must be maximized to guarantee maintenance of existing ecological conditions both within these two national forests and within the hundreds of thousands of other public and privately owned natural lands that depend on them for wildlife population stability. The proposed growth between the subject project area and Highway 138, area where the first phase of the Tejon Ranch project has been proposed, leaves no existing, or potential, safe crossing unless all the component land is publically owned. In addition, those public agencies must put in place permanent safeguards to insure that linkage function cannot diminish on their lands. Those public agencies include Caltrans and the Los Angeles County Department of Public Works because they control the transportation corridor rights-of-ways and their ubiquitous fencing.

The EIR may show that better cross-I5 habitat linkages exist north of the project site between Violin Summit and Highway 138. However, regardless of the presence of such linkages, two factors make potential cross-I5 habitat linkages just east of the proposed project area regionally important. Habitat linkage redundancy and spatial separation is critical to maintain species diversity. In addition, linkage redundancy is critical insurance to compensation for adverse impacts from future transportation and other infrastructure projects through the I5 corridor.

The EIR must provide a thorough examination of the opportunities and constraint for wildlife movement across I5 between the southern boundary of the project area and Violin Summit. Property ownership and rights-of-way analyses are critical to such a study.

Two underpasses beneath the southbound lanes of I5 provide excellent opportunity for wildlife to cross into the multi-hundred acre habitat area between the two south and north bound lane crossovers. One such underpass is located approximately parallel to the intersection of the northern boundary of Phase One and Old Ridge Route. The other undercrossing is located more northward, approximately in the center of the southwest quarter of Section 3. That is, essentially, the north-south mid-point of Phase Two. There may be additional undercrossing not uncovered by our analysis. These underpasses probably represent the southernmost, large animal routes under I5 until Castaic Creek crosses under by Highway 126. We do not know if undercrossings, or good sites for potential undercrossings, exist beneath the northbound lanes. The EIR must examine the opportunities for crossing under the northbound lanes.

**Project Phases One and Two must be Included in Single Subsequent EIR**

All cumulative impacts and wildlife habitat linkage analyses of the subject area must include all of the subject Northlake project. For example, a Phase One project footprint that provides marginal wildlife access to existing Interstate 5 (I5) undercrossings, could have that access eliminated by multiple Phase Two alternative project footprints. For this reason, and given the 12 to 13-year gap since the Specific Plan EIR, adequate California Environmental Quality Act (CEQA) review of the subject project must lump Phases One and Two as a single project in the subject Subsequent EIR. If that action is not taken by the County, the DEIR must include a comprehensive answer why the two phases do not have to be considered in a SDEIR.

The proposed Phase One project includes a minimum of three arterial streets that come to the border of Phase Two. The future contemplated development of Phase Two mandates analysis of its potential impacts with Phase One. We assume that the golf course that was removed from the Specific Plan had been located in the Phase Two area. Essentially the project description is heavily flawed. Our analysis leads to the conclusion that the subject project must start from scratch in the CEQA review process. If the County comes to a different conclusion, the DEIR must include a definitive comprehensive answer why any portion of the project is already grandfathered under the 1992 EIR. If no portion of the project has such grandfathered protections, would not the appropriate CEQA review be a fresh new EIR as opposed to a SEIR? Our position is that project piecemealing will occur under all circumstances unless a full DEIR is prepared for all potential development on the property including the small remainder parcel shown in the southwest corner of the project site.

The DEIR analysis must address the influence of the approved Development Agreement on the issue of requiring a combined Phase One and Two EIR or SEIR. When did, or does, the Development Agreement expire? If it is expired should not the CEQA process start from scratch?

What is the effect of proposed offsite grading on prior Specific Plan and CEQA approval?

It is not clear if the 1992 Specific Plan and EIR encompassed the approximately 284 acres of off-site grading on adjacent private land and within the Castaic Lake State Recreation Area. If the 1992 EIR did not include any offsite grading, then the project description has changed substantially. If the County disagrees with this conclusion, the DEIR must include a definitive, comprehensive answer why the project description has not changed

substantially and that a fresh EIR is not required.

In order to guarantee the safety of the public visiting the open space dedication and of the new adjoining homeowners, as well as the ecological integrity of the open space, another critical mitigation measure that must be included in the DEIR is a permanent funding mechanism to maintain the property. Dedication of land is only a complete mitigation measure if funding is provided. Two mechanisms to provide this maintenance funding include a non-wasting endowment set up by the developer over a specific period of time, or a property assessment. A minimum of \$25,000 per year must be provided for maintenance of the open space. To our knowledge, a Community Facilities District (CFD) is the optimal method for such a funding source. The Conservancy's joint powers entity, the Mountains Recreation and Conservation Authority, can be the entity that forms, administers, and benefits from the CFD.

Please address any questions and future correspondence to the attention of Paul Edelman at the above address and by phone at (310) 589-3200 ext. 128.

Sincerely,

JEROME C. DANIEL  
Chairperson